

Affidavit of Maribeth Holderith

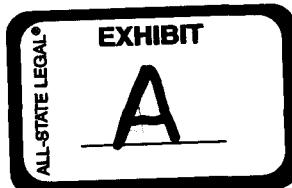
In reference to my employment at One Step Diagnostic Inc.

I, Maribeth Holderith, hereby produce this affidavit as to the facts in evidence concerning my employment at One Step Diagnostic Inc. and or its affiliates.

I started working at One Step in October 2008 and I was employed in marketing. My title was and to this day is Physician relations. Prior to working at One Step I was marketing for Universal MRI in Houston Texas for a period of 10 years intermittently.

After starting my employment at One Step in 2008 , I began working in the Pearland MRI office and which was one of 6 facilities owned by Fuad Cochinwala(aka Mohammed Raymond) President and CEO of the One Step Diagnostic Companies. As I commenced my marketing duties , approximately 8 months later I was instructed to set up joint meetings with physicians and Fuad Cochinwala and upon setting up the meeting I attended the initial meeting, introduced Fuad and the physicians and was then expected to leave the meeting and leave Fuad and the physicians to discuss the business of referrals without me. Fuad would later inform me that he had come to an agreement with the said physician for either a medical director agreement or a medical consultant agreement. Thereafter every month I was instructed to deliver an envelope with a check enclosed along with a summary with charts for the physician to review. In some cases there was just a check delivered without charts or supporting documentation. Under the Medical Director agreement the physicians who were receiving checks were to review medical files in the Imaging Center. However, in many cases there were podiatrists reviewing orthopedic surgeons, neurologists, and neurosurgeons. The contract for the Medical directors required them to come to the Centers once a month for Quality Assurance, this hardly ever occurred. Typically I would have to take the charts to them for review. One of our Doctors, Dr. Mark Sands, asked me how his numbers were, after I informed him where he was at, he asked for an increase in his monthly payment since he indicated he was sending more business. I directed that to Fuad , and Fuad gave increased his monthly check. Dr. Jeter, a chiropractor, received a check every month with no agreements whatsoever. Dr. S. Majun Munder is a local neurologist, also received checks every month. Dr. Jeffery Baxter, Dr. B Canals, also received checks . In the past Dr. Neuberger and Yazak, chiropractors, also received large amounts for their referrals. These are the main doctors/chiropractors. Podiatrists who received compensation form the Pearland facility. At times I was requested to deliver checks to other Doctors throughout the Houston area for other facilities owned by the One Step Group.

Some of the checks that were distributed were distributed thru the One Step corporate bank accounts. However in the last year and half the checks were distributed thru ARC, and Houston Diagnostic(a supposed scheduling company) , affiliate companies of One Step. Other marketing reps that who work for One Step have during the course of our formal and informal meetings acknowledged that they also



have delivered checks to health care Providers who utilize their respective One Step Centers. Among marketers have confirmed that their centers follow a similar strategy.

In my Pearland Center specifically, I was requested on numerous occasions when a patient's deductible had not been met, our scheduler was instructed to ask one of our chiropractors to add an additional scan not necessary to cover the deductible cost. Out of network providers were instructed to go thru ARC an out of network company designed to skirt the in network rules.

In some cases(i.e. Medicaid) there are different managed care plans for Medicaid that we were not on, if we didn't take it we would bill it through one of our other centers that did not perform the procedure.

In many cases, when One Step was getting authorizations for patients, they would represent themselves as the physician's office to get the authorizations.

Companywide it is also their policy to deliver gift cards to front office staff in the amounts of \$25.00 and up it was understood with many of the office staffs that for certain amount of referrals the staff member would receive a gift card.

Being a Healthcare professional, I have decided to come forward. My employer, One Step Diagnostic Inc. , its affiliates, and principals have committed actions that may be illegal and are not in the best interests of our patients. I have recently become aware that another imaging company in Houston has been reprimanded for similar and or like offenses and realize my employer is probably doing the same thing

By Janileth Hollenith

Date 9 August 2012

SUBSCRIBED AND SWORN TO BEFORE me on this the 9th day of August, 2012.


Kelly J. Guzman
NOTARY PUBLIC, STATE OF TEXAS

